State Plan for the American Rescue Plan Elementary and Secondary School Emergency Relief Fund



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By signing this document, I agree to each of the assurances listed in Appendix C and further assure that:

To the best of my knowledge and belief, all information and data included in this plan are true and correct.

Chief State School Officer or Authorized Representative (Printed Name) Dr. Margie Vandeven

Signature of Authorized SEA Representative

Margen Vandeven

Date:

6/15/2021

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A. Describing the State's Current Status and Needs

The Department recognizes the extraordinary efforts made by States, LEAs, and educators to support students during the COVID-19 pandemic. In this section, SEAs will describe the progress they have made, the priorities and student needs guiding their ARP ESSER funding decisions, and their current and projected operating status.

- Progress and Promising Practices: Provide your assessment of the top 2-3 strategies that have been most effective in supporting the needs of students in your State during the COVID-19 pandemic, especially for students most impacted by the COVID-19 pandemic. Please include, if applicable, how your State will submit and encourage its LEAs to submit lessons learned and best practices to the Department's <u>Safer Schools and Campuses Best Practices Clearinghouse</u> so that they can be shared with other States and LEAs.
- Response History and context are critical to understanding the most effective strategies for supporting LEAs in Missouri. As a local control state, the majority of decision-making occurs at the local level. At the outset of the pandemic, with the understanding of the nature of local control, the Missouri Department of Elementary and Secondary Education (MODESE) prioritized working quickly to remove barriers to give local leaders as much flexibility as possible so that they could make the best decisions to ensure that staff and students were safe, that students were educated, that students were fed, and that schools continued to be paid for their work. These priorities represent the "North Star" for MODESE during the pandemic.

MODESE has sought to eliminate barriers temporarily to provide for continued safe operation of schools and the continued delivery of instruction and support services to students and families. In consultation with experts such as the American Academy of Pediatrics and under the direction of the State Board of Education (SBE), MODESE has been working hard since March 2020 to support 555 local school districts/charters and the local boards that govern them as they work to implement the very challenging decisions they made to best serve their communities. We are grateful to our partners across state government for prioritizing safely reopening schools in an effort to best serve Missouri students. While all schools were closed by the end of the 2019-20 school year, calls for safely reopening schools for the summer and 2020-21 school year were being issued as early as May 2020. By June 2020, some LEAs were able to offer onsite and hybrid option summer school. All LEAs were in session by September 13, 2020, with 89 percent offering onsite options. At the peak of COVID-19 case counts, only 25 percent of schools were fully distanced. By the close of the 2020-21 school year, all Missouri districts and 94.4 percent of charter schools were offering onsite learning opportunities. However, even in those schools with onsite learning options, some parents chose to keep their children home and use an online learning option. According to the American Enterprise Institute's Return to Learn Tracker, on March 8, 2021, Missouri ranked as having the 5th highest

proportion of in-person learners (behind Florida, Alabama, Kansas, and Arkansas).

Flexibility:

On March 13, 2020, Commissioner Vandeven issued guidance regarding school finance, attendance, CDC recommendations, virtual learning, and food service, urging superintendents to "focus on the health and well-being of students, provide as much normalcy as possible, and provide educational opportunities to students."

- The SBE filed an emergency rule with the Missouri Secretary of State that allowed schools to implement hybrid models of instruction for the purpose of reducing the number of students onsite at any given time. Schools developed Alternative Methods of Instruction Extended (AMI-X) plans and submitted them to MODESE for approval. The plan included not only the pattern of alternating onsite instruction days but also the LEA's design to deliver instruction to all students, regardless of broadband availability. The 2020-21 school year opened with all 555 LEAs having approved AMI-X plans.
- MODESE sought, and Governor Mike Parson approved, 17 waivers of state statute to provide flexibility to school leaders as they faced the challenges of the COVID-19 pandemic.
- MODESE addressed a number of issues unique to 2020's graduating seniors, including assessment, Industry Recognized Credentials, graduation credit requirements, and local options for determining credit.

Education:

Understanding that the unprecedented disruption of the COVID-19 pandemic would have significant effects on student learning and student welfare, MODESE immediately initiated two task forces to support schools and students: the Summer School Task Force and the Learning Acceleration Task Force (LATF).

- The Summer School Task Force provided MODESE with three recommendations to safely meet students' needs during the summer of 2020: provide maximum flexibility to schools, provide clear expectations for summer learning, and provide clear expectations for virtual summer school. MODESE removed restrictions on summer school scheduling and attendance requirements and issued instructional expectations. Guidance included considerations for mitigation strategies to help ensure a safe and healthy learning environment.
- The LATF was charged with making recommendations to MODESE that would address immediate and long-term student academic needs. The LATF

was comprised of 118 stakeholders, 91 of which were external and represented 37 stakeholder groups. The work of the LATF is discussed later in this application but in summary, the recommendations included identifying priority standards, providing benchmark assessments, and providing instructional resources.

Food and Nutrition Services:

During spring and summer of 2020, MODESE helped districts and charters implement food service programs to support students and families across the state. These included the Meal Service During Unanticipated School Closures Waiver, the Seamless Summer Option, Summer Feeding Service Program, and the Waiver to Allow Seamless Summer Option Meals in a Non-Congregate Setting. MODESE's Food and Nutrition Services program issued significant guidance to LEAs on applications, allowable use, and claiming. Further, MODESE participated in the Pandemic Electronic Benefit Transfer program, which ultimately approved over 62,000 qualified applications to benefit over 118,000 children.

Teacher Workforce:

MODESE's Office of Educator Quality took several actions to support LEAs. This team maintained continuity of service by establishing safety protocols to ensure onsite work continued at MODESE to enable the issuing of nearly 27,000 teacher certificates. The office also launched an online training course for substitute teachers which helped add 4,400 additional substitute teachers to the workforce.

Communications Strategies:

None of these efforts would have been possible without a significant communications and stakeholder engagement operation. MODESE has hosted well over 100 webinars since the pandemic started. Audiences included school leaders, school nurses, local public health agencies, and other stakeholders. Audience members benefited from collaborative communications and direct access to MODESE, the Missouri Department of Health and Senior Services (MODHSS), and other health experts. In addition to these webinars, MODESE convened school leaders weekly, and later bi-weekly. These regular meetings of superintendents and school association leaders ensured that collaborative, twoway communication was ongoing. Both MODESE and school leaders found value in understanding the perspectives of others. An additional avenue of communications was MODESE's team of 12 regionally-based area supervisors of instruction. These staff members are assigned to serve all LEAs in their region and are a critical interface with the leaders of those schools. MODESE held virtual meetings with the area supervisors every other day for months, gradually reducing this to semi-weekly and ultimately bi-weekly meetings. This regular pattern of dialogue was another critical way to ensure timely two-way communications took place.

Continuity of Financial Services:

MODESE's Division of Financial and Administrative Services continued to operate seamlessly during the pandemic. LEAs were paid on time every month, regardless of any challenges faced by either MODESE or the schools. This occurred even as the division allocated over \$3.2 billion and distributed over \$400 million in federal relief funds.

Key Strategies to Support the Needs of Students During the Pandemic

All the strategies above were essential to supporting students and schools. MODESE understands that its support of students is often indirect, by supporting LEAs that, in turn, support their students. In light of these efforts, and understanding that the effects of some of the efforts will not be evident for some time, MODESE has determined the following to be the strategies most effective to address the needs of Missouri students during the pandemic: safely reopening schools, accelerating student learning, and bridging the digital divide. MODESE has implemented these "big ideas" in very concrete ways.

Safely Reopening Schools

MODESE's ongoing collaborative communications about safe school operations in the midst of the pandemic provides critical information to school leaders and other stakeholders. Over the course of the last 15 months, many changes in guidance have taken place. Research has provided an increasingly clear and complete picture of the importance of layering mitigation strategies and the relative safety of schools when mitigation strategies are properly implemented. When free masks and later antigen test kits became available, school leaders received that information and shipments of supplies through MODESE and partner state agencies. As vaccine eligibility was opened and vaccinations became available, MODESE informed stakeholders of the most current and essential information. MODESE also facilitated ongoing webinars for school leaders, school nurses and local public health officials to have direct access to MODHSS officials and other health experts. These efforts have clearly supported the safe operation of schools and will continue as conditions change and information is updated. Current conditions are significantly better than they have been for some months. However, as school reopens in the fall and as seasonal changes bring more people indoors and into closer contact, MODESE will ensure that school leaders have the essential information to ensure the safe operations of schools.

Learning Acceleration

The impact of the pandemic on instructional time has created a significant need to establish where student learning is now and to develop a plan to accelerate their learning when needed. For MODESE, the definition of *learning acceleration* is important. "Acceleration of learning is the instructional practice of ensuring that students consistently receive grade-level materials, tasks, and assignments. It requires educator focus on moving forward rather than backward, using scaffolds to fill in only the most critical gaps—not in isolation, but at the moment they are

needed within grade-level work."1 Acceleration focuses on teaching students on grade level, scaffolding in missing knowledge, in contrast to *remediation* that focuses on teaching all of the prior knowledge while also teaching all of the current knowledge. The latter approach leads to frustration and a sense of futility. To support educators in meeting students' academic needs, MODESE commissioned the LATF in late spring of 2020. The LATF, as previously mentioned, was comprised of 118 stakeholders, 91 of which were external and represented 37 stakeholder groups. This task force recommended identifying priority standards, the essential content at each grade level, and providing benchmark assessments aligned to these standards. To accomplish this task, MODESE convened an additional 1,363 stakeholders, representing 20 stakeholder groups. This group, in the course of 16 meetings, identified the priority standards, found here. Priority standards will drive and focus the work of an assessment redesign effort over the next two years. In the field, they will inform instruction, allowing local flexibility for additional emphasis. Further, the LATF recommended providing aligned instructional resources. MODESE has also provided benchmark assessments and learning modules under the Missouri Learning Engagement and Preparation (MO LEAP) learning acceleration initiative. The work of the task force can be found here.

Bridging the Digital Divide

Through a collaborative cross-agency team, a statewide analysis of broadband availability was performed during spring 2020. Data included surveys of schools regarding the availability of devices and broadband in students' homes. The Office of Broadband Development, in collaboration with the Missouri Online Research in Education Network (MORENet), produced maps of statewide infrastructure and connectivity speed. This analysis verified what most already believed: broadband availability is extremely variable across Missouri. In response, Governor Mike Parson prioritized the use of the Governors Emergency Education Relief (GEER) funds and MODESE prioritized the use of ESSER state reserve funds to address the digital divide. MODESE acknowledges significant support from Missouri Governor Mike Parson's office in the use of GEER funds and additional Coronavirus Relief Funds for this effort. These funding streams were used to support two grant programs that quickly addressed the immediate technology needs of learners. Because the earlier analysis confirmed that broadband availability was a significant need, the first grant program gave funds to schools to provide or enhance external access to the schools' networks. This grant focused on the provision or enhancement of perimeter Wi-Fi, as well as providing hotspots and school bus-based Wi-Fi. Broadband infrastructure and affordability are still critical issues for learners in the long-term. However, these solutions provided some immediate relief to learners in every school. The second

¹ Learning Acceleration Guide: Planning for Acceleration in the 2020-2021 School Year. Retrieved June 22, 2020 from https://tntp.org/covid-19-school-response-toolkit.

grant program provided funds to purchase Wi-Fi enabled devices for students. Survey data indicated that approximately 20 percent of Missouri students did not have devices available at home. The grant program provided allocations to approximately 62 percent of LEAs. The LEAs were ranked by need, using poverty and the Digital Divide Index.² Allocations were calculated, based on student enrollment. Funding was awarded, according to rank, until the entire \$20 million was distributed. The grant provided support to students in the LEAs most in need and least able to supply students with devices. These grants met important, immediate needs but did not fully address the issue of equitable and affordable access to digital learning resources. More is yet to be accomplished.

As these strategies are implemented, MODESE will analyze evidence of the effectiveness of each (safely reopening schools, learning acceleration, and addressing the digital divide) as data are gathered. MODESE designed the efforts based on data and MODESE is implementing them with the greatest fidelity possible. Lessons learned and additional improvement will be identified. As best practices and lessons learned are identified, MODESE will submit, or encourage LEAs to submit, these to the Safer Schools and Campuses Best Practices Clearinghouse.

- 2. <u>Overall Priorities</u>: Provide your assessment of the top 2-3 issues currently facing students and schools across your State as a result of or in response to the COVID-19 pandemic including, to the extent possible, data illustrating why these are the most critical and/or most widespread issues facing schools and students.
- Response Missouri schools, and by extension Missouri students, face a number of challenges because of, or magnified by, the pandemic. The social-emotional wellbeing of our students is a major issue and is discussed below. Three additional critical issues MODESE must seek to address center on the educator workforce, learning acceleration, and reducing the digital divide.

Research is clear that the most important school-level factor in student learning is the teacher³ and the most important factor in supporting teachers is the principal⁴. The effectiveness of a school rests heavily on the shoulders of educators and building leaders. Missouri entered the pandemic with data showing that the supply of teachers was declining. Over the last 10 years, enrollment in teacher preparation programs has fallen by nearly 42 percent. Since 2014, the number of students completing teacher preparation programs has fallen by 29.4 percent. The number of teaching certificates has fallen by 10.5 percent. The teacher attrition

² https://pcrd.purdue.edu/2019-digital-divide-index-ddi/

³ Tucker, P. and Stronge, J. (2003), *Linking Teacher Evaluation and Student Learning*, ASCD.

⁴ Wallace Foundation. (2011). *The school principal as leader; Guiding schools to better teaching and learning.* Retrieved from http://www.wallacefoundation.org/knowledge-center/school-leadership/effective-principal-leadership/Documents/The-School-Principal-as-Leader-Guiding-Schools-to-Better-Teaching-and-Learning.pdf on May 21, 2021.

trend lines are showing modest improvement, but at this time less than two-thirds of third-year teachers continue to their fourth year. Less than half of fifth-year teachers continue to their sixth year. Clearly, Missouri schools and students need these trends to reverse. The impact of the pandemic is only exacerbating these negative trends. Data for the current year are incomplete but at this time, available data indicate that approximately 11.4 percent more teachers will retire at the end of the 2020-21 school year as compared to the prior two years. School leaders indicate that this increase is directly tied to the increased stress the pandemic caused for educators. Teachers are expressing a level of fatigue that they have not had before. With that understanding, the MODESE prioritizes investing in teachers and principals.

While the supply of principals is less concerning, ensuring that they are effective leaders, particularly during this challenging time, is a priority. MODESE provides the Missouri Leadership Development System (MLDS) for this purpose. MLDS currently serves nearly 1,100 school leaders in the state, focusing on developing essential skills and effective practices in the key areas of Visionary, Instructional, Managerial, Relational, and Innovative Leadership. Over the last three years MLDS principals have provided more stability for their schools, staying in the same position between 93-98 percent of the time as compared to 82-84 percent of the time for non-participants. Research suggests that principal turnover results in reduced student outcomes.⁵ Continuity of leadership provides an advantage to schools with MLDS principals. MODESE must increase its capacity to support principals so that all, not just half of principals, have access to MLDS.

Accelerating learning is a critical issue for all students, but even more so for students from low-income families, black students, and students experiencing homelessness. Preliminary enrollment data found in Table A1, indicates that those groups had significantly lower rates of enrollment than the state average. MODESE's survey, outlined in Question C.1., identified concerns for the pandemic impact on elementary, high school, low-income, homeless, and students with disabilities. Some schools have offered in-person instruction for the whole year, but others were heavily dependent on distanced instruction. Leaders in these schools indicate that student engagement was often reduced in distanced settings. Reduced engagement, and in some cases lack of enrollment, may leave many students lacking the essential knowledge and skills to be successful.

With all students in mind, but with particular concern for those most impacted, MODESE will continue the work of implementing priority standards. This includes aligning assessments to those standards and emphasizing the importance of students being able to read by the end of second grade.

⁵ Bartanen, B., Grissom, J., and Rogers, L. (2019). *The impacts of principal turnover*. Educational Evaluation and Policy Analysis, Sage. Retrieved from https://journals.sagepub.com/doi/abs/10.3102/0162373719855044 June 3, 2021.

Finally, disparities in access to broadband, and therefore digital resources, is an issue that cannot be ignored. These differences are significant contributors to the disparate impact of the pandemic on specific groups of students. While nearly every LEA in Missouri has a high-speed fiber optic connection, data indicates that 1 in 5 Missouri students lack access to reliable high-speed internet in their homes because it is either unaffordable or unavailable. This lack of broadband is most evident in urban and remote, rural areas, both of which have greater economic challenges. When distanced instruction has been, is, or will be necessary, students must have access to high-speed internet.

The pandemic has caused an increased reliance on data and broadband access for students, but has also highlighted a known shortcoming for MODESE. Our longitudinal data system, built over 15 years ago, simply can't keep up with the current need for data collection, analysis, or visualization. The underlying hardware and software architecture lacks both capacity and agility. Installation of analytical and visualization software is challenged by the limited resources available. In this new environment, the availability of near real-time data that is both accurate and reliable is critical for decision-makers as they seek to support student learning. These factors suggest that MODESE should upgrade its longitudinal data system.

- 3. <u>Identifying Needs of Underserved Students</u>: Describe your State's 2-3 highest priority academic, social, emotional, and/or mental health needs for the remainder of the 2020-2021 school year (if applicable) and for the 2021-2022 school year related to the impact of the COVID-19 pandemic on each of the following student groups:
 - i. Students from low-income families,
 - ii. Students from each racial or ethnic group (e.g., identifying disparities and focusing on underserved student groups by race or ethnicity),
 - iii. Gender (e.g., identifying disparities and focusing on underserved student groups by gender),
 - iv. English learners,
 - v. Children with disabilities (including infants, toddlers, children, and youth with disabilities eligible under the Individuals with Disabilities Education Act ("IDEA")),
 - vi. Students experiencing homelessness,
 - vii. Children and youth in foster care,
 - viii. Migratory students, and
 - ix. Other groups disproportionately impacted by the pandemic that have been identified by the SEA (e.g., youth involved in the criminal justice system, students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years, students who did not consistently participate in remote instruction

	when offered du students).	ring school build	ling closures, and LGBTQ+	-	
Response	To the extent possible, this description should include data on indicators such as estimates of the academic impact of lost instructional time, ⁶ chronic absenteeism, student engagement, and social-emotional well-being.				
	As of this application, data for the current school year are incomplete. As data from the 2020-21 school year are available during summer 2021, MODESE will analyze academic achievement, attendance, and other information for the state as a whole for all students and by subgroups. MODESE currently has preliminary enrollment data for the 2020-21 school year. Based on these early data, the state saw a decline of approximately 3.2 percent in enrollment for the 2020-21 school year as compared to the prior three-year average. Enrollment has been declining by less than one percent in the past. MODESE expects that many students who were not enrolled previously will enroll for the coming year, many with a significant amount of lost instructional time.				
	Preliminary enrollment data are broken down by the groups in Table A1. Reduced rates of enrollment are more pronounced for black students, students from low-income families, and children and youth experiencing homelessness. The figures in Table A1 are comparisons of the 2020-21 enrollment data to the same group's prior three-year average. When enrollment for schools in urban settings is disaggregated, the effects are more pronounced.				
	Additional data analysis must be performed when 2020-21 data, including state assessment results, are complete. However, enrollment data make it clear that there are significant groups of students that must be re-engaged in school. MODESE expects future analysis to show the academic and social well-being effects of disengagement on those students who have not been consistently engaged or enrolled. Even when students have been enrolled, MODESE is concerned about those with low engagement. Table A1.				
	Student Group	Percentage	Highest Priority Needs		
		Enrollment Gain or Loss			
	Students from low-income families	-5.6	To be determined upon further data analysis	1	
	American Indian/Alaska Native	-3.1	To be determined upon	1	
	Asian	-2.0	further data analysisTo be determined uponfurther data analysis		
	D1 1			_	

⁶ For the purposes of the plan, "academic impact of lost instructional time" refers to "learning loss" experienced by students as a result of the COVID-19 pandemic, as referenced in the ARP Act and the CRRSA Act.

-5.5

To be determined upon further data analysis

Black

Student Group	Percentage Enrollment Gain or Loss	Highest Priority Needs
Hawaiian/Pacific Islander	17.7	To be determined upon further data analysis
Hispanic	4.3	To be determined upon further data analysis
Multi-Race	11.3	To be determined upon further data analysis
White	-4.4	To be determined upon further data analysis
Male	-3.3	To be determined upon further data analysis
Female	-3.1	To be determined upon further data analysis
English learners	-4.5	To be determined upon further data analysis
Children with disabilities	-3.6	To be determined upon further data analysis
Students experiencing homelessness	-5.7	To be determined upon further data analysis
Children and youth in foster care	-6.2	To be determined upon further data analysis
Migratory students	-9.6	To be determined upon further data analysis
Gifted	-7.3	To be determined upon further data analysis

4. <u>Understanding the Impact of the COVID-19 Pandemic</u>: Describe how the SEA will support its LEAs in identifying the extent of the impact of the COVID-19 pandemic on student learning and student well-being, including identifying the groups of students most impacted by the pandemic. Where possible, please identify the data sources the SEA will suggest its LEAs use in thoughtfully diagnosing areas of need, including data on the academic, social, emotional, and mental health impacts of lost instructional time.

Response At the outset of the pandemic, MODESE was keenly aware of the need for more data than was usually collected. In addition to the routine collection of enrollment and attendance, MODESE began collecting modes and patterns of instruction and the availability of broadband and internet devices. These data are important in understanding some pandemic effects.

Those data are also important to help paint the whole picture of state assessment outcomes. Even though the SBE suspended the use of assessment results for state and federal accountability purposes (federal waiver approved June 9, 2021), all LEAs are working to assess every student possible onsite. MODESE extended assessment windows to June 15, 2021 to provide added flexibility for LEAs working to ensure tests are administered in safe and healthy environments.

The 2021 assessment data are not comparable for accountability purposes but will provide insight into the state of student learning in Missouri. MODESE has advised LEAs not to use 2021 assessment data for any high stakes purposes. The analysis of this body of student enrollment, attendance, instructional modality, digital resource availability, and state assessment data will significantly improve MODESE's support of LEAs. Aggregate data will be made publicly available to inform investments at the state and local levels.

When data collection is complete for 2020-21, MODESE will analyze outcomes in two ways. First, MODESE will analyze the data to examine the disparate impact of the pandemic on students and student groups identified in Question 3. As noted earlier, assessment data collected this year is not comparable to prior years. It constitutes a single data point in the context of the pandemic. Assessment data for 2020-21 will be disaggregated to determine differences in achievement, based on the mode of instruction and on student groups. MODESE hypothesizes that the analysis will surface information regarding the mode of instruction and increases in equity gaps. Where digital resources were few and instruction was primarily remote, MODESE expects achievement to be lower when compared to other settings. Because of this, the identification of priority standards and accelerated learning, including through competency-based learning approaches, will be most important for these groups.

Second, MODESE will use its value added growth model to analyze assessment results.⁷ Again, MODESE will not use the results of the 2020-21 assessments or growth model calculations for accountability and has advised LEAs to avoid their use for any high stakes purposes, such as teacher evaluations or student grades. Missouri will use its growth model calculation to better understand pandemic effects and to inform future steps. Growth will be calculated for all students and aggregated by mode of instruction: Onsite, Distanced Instruction - Primarily Online, Distanced Instruction - Primarily Other than Online, Blended Instruction (hybrid pattern), and Virtual Instruction. Additionally, the growth model will be used to establish whether or not there were patterns of student learning associated with geography and digital resource availability.

This thorough analysis of the 2020-21 assessment data will include disaggregation of outcomes by student groups, mode of instruction, digital availability, and prior achievement level. MODESE will share the results of these analyses with LEAs to assist them in their local decision-making.

Given that MODESE does not have a standard tool for gauging the social, emotional, and mental health needs of students and staff, there is some uncertainty

⁷ Fazlul, I., Koedel, C., Parsons, E., and Qian, C. (2021). Bridging the covid divide: How states can measure student achievement growth in the absence of 2020 test scores. *Fordham Institute*. Retrieved from https://fordhaminstitute.org/national/research/bridging-covid-divide-how-states-can-measure-student-achievement-growth-absence May 26, 2021.

about what those needs are. Certainly there is variability in how school leaders characterize their students in this area. It is clear that in many LEAs, students lacked access to supports and socialization, leaving them with unmet needs. Anecdotal information regarding educators is more consistent, indicating that educators, particularly teachers, are very fatigued.

MODESE is well positioned to support LEAs with state assessment analysis. To the extent possible, MODESE will also work collaboratively with LEAs and assessment vendors to triangulate state and local interim assessment outcomes with state summative assessments. This collaborative approach should not eliminate the need for LEAs to use their local data to draw conclusions and make decisions. Local assessment data may confirm state assessment data. Alternatively, LEAs may find that local assessments are not well aligned to state standards. Beyond student learning, MODESE encourages LEAs to examine their own enrollment and attendance data to establish which students will need additional support. Finally, LEAs should take careful stock of both students' and staff members' social, emotional, and mental health needs. Some of these data may be available within the LEA. In some cases, LEAs should be prepared to collaborate with other local agencies to establish need and develop resources.

- 5. <u>School Operating Status</u>: It is essential to have data on how students are learning in order to support the goals of access and equity, especially for student groups that have been disproportionately impacted by the COVID-19 pandemic. Describe the current status of data collection on operational status and mode of instruction of all schools in your State. This description must include:
 - i. A description of to what extent, and how frequently, the State collects now and will collect in the future data for all schools in your State on:
 - a. Mode of instruction: The number of schools in your State that are offering fully remote or online-only instruction; both remote/online and in-person instruction (hybrid model); and/or full-time in-person instruction;
 - b. Enrollment: Student enrollment for all students and disaggregated for each of the student groups described in A.3.i-viii for each mode of instruction; and
 - c. Attendance: Student attendance for all students and disaggregated for each of the student groups described in A.3.i-viii for each mode of instruction.
- Response During the 2020-21 school year, MODESE collected the *mode of instruction*, the predominant method of instruction experienced by individual students, three times each year: October, February, and June. The mode of instruction selected applies to the period of time prior to the data collection. The modes of instruction MODESE is collecting is as follows:
 - Onsite Instruction;

- Distanced Instruction, Primarily Online;
- Distanced Instruction, Primarily Other than Online;
- Blended (hybrid pattern) Instruction; and
- Virtual Instruction.

On August 11, 2020, MODESE began collecting and <u>publishing</u> the *pattern of instruction*, a summary of how instruction is being delivered in each LEA across the state. The data showed which patterns of instruction LEAs offered each day. The patterns included the following and were updated daily:

- Onsite (all students receiving in-person instruction);
- Onsite with a Distanced Option (families may choose in-person or distanced instruction);
- Blend of Onsite and Distanced (LEA determines which schools/grade levels receive either in-person or distanced instruction; includes patterns of days alternating in-person and distanced instruction);
- Distanced (all students receiving distanced instruction); and
- Closed (no instruction).

The state regulation enabling hybrid instruction will expire on July 30, 2021. MODESE will collect and publish the patterns of instruction in the fall, if the data are useful in decision-making and informing the public. MODESE expects these data to be limited to onsite and virtual instruction. Because Missouri statute allows any eligible public school student to request enrollment in the Missouri Course Access and Virtual School Program (MOCAP), a program of virtual instruction administered by the state, every LEA in the state will offer two instructional modalities to their students.

MODESE collects *student enrollment* five times each year: October, December, February, April, and June. These data are used for a variety of purposes. Beginning in the 2019-20 school year, MODESE disaggregated the data by pattern of instruction in order to determine the number of students in LEAs that were implementing hybrid and distanced instruction. MODESE expects to continue to collect the data.

MODESE has three cycles of *attendance* collection: August (prior summer school, required), April (optional), and June (regular term, required). These data are traditionally used for school accountability and state payment calculation. By SBE action, the use of attendance for accountability purposes has been suspended during the 2019-20 and 2020-21 school years. MODESE will report student attendance on the state, LEA, and school report cards, and may include it in other reports. Report cards can be found <u>here.</u>

ii. The data described in A.5.i.a. and b. using the template in Appendix A (and to the extent available, the data described in A.5.i.c.) for the

	most recent time period available. Please note that this data can be submitted separately within 14 calendar days after a State submits this plan. The SEA must also make this data publicly available on its website as soon as possible but no later than June 21, 2021, and regularly provide updated available information on its website. The Department will periodically review data listed in A.5.i on SEA websites.
Response	The data are included in the tables in Appendix A and data are published on the MODESE website <u>here</u> .
	iii. To the extent available, a description of the planned operational status and mode of instruction for the State and its LEAs for summer 2021 and for the 2021-2022 school year.
Response	 As noted earlier, the state regulation enabling hybrid instruction will expire on July 30, 2021. This regulation was enacted to support safe school operations while preserving instruction. As also noted earlier, schools may offer virtual instruction within statutory requirements. MODESE may pursue further enabling regulation to allow for mixed delivery of instruction. This decision will be based on further research, including the data analysis noted above. As of June 1, 2021, data indicate that 384 of 555 LEAs will hold summer school. Of the 384, six intend to deliver instruction in a hybrid model, four intend to offer virtual instruction, and the remainder will be onsite. In Missouri, students residing where no local summer school is offered may enroll anywhere summer school is offered.

B. Safely Reopening Schools and Sustaining their Safe Operations

The Department recognizes that safely reopening schools and sustaining their safe operations to maximize in-person instruction is essential for student learning and student well-being, and especially for being able to address the educational inequities that have been worsened by the COVID-19 pandemic. In this section, SEAs will describe how they will support their LEAs in this vital area.

- 1. <u>Support for LEAs</u>: Describe how the SEA will support its LEAs in safely returning to in-person instruction and sustaining the safe operation of schools. This description must include:
 - i. How the SEA will support its LEAs implementing, to the greatest extent practicable, prevention and mitigation policies in line with the most up-to-date guidance from the Centers for Disease Control and Prevention ("CDC") for the reopening and operation of school

facilities to effectively maintain the health and safety of students, educators, and other staff;

Response As noted at the beginning of this application, MODESE began extensively supporting LEAs in implementing COVID-19 prevention and mitigation strategies aligned to CDC guidance. The guidance developed by MODESE included over 100 webinars and hundreds of pages of written documents, much of which addressed safe school operations and safe reopening plans for the 2020-21 school year. The webinars provided school leaders and other stakeholders direct access to MODESE, MODHSS, and nationally recognized Missouri pediatric infectious disease experts from Children's Mercy Kansas City (Missouri) and Washington University (St. Louis, Missouri). MODESE also presented the most current COVID-19 response information to the SBE every month for over a year. SBE meetings are live-streamed for the benefit of LEAs and the public.

> One outgrowth of the close relationship between MODESE and the MODHSS, due to the ongoing collaborative communications, was the development of a distribution network. Since spring 2020, MODESE has shipped 236,520 BinaxNOW antigen test kits and 8.6 million masks to schools.

MODESE was pleased to collaborate with the CDC, MODHSS, and Washington University to study the effects of mitigation strategies on transmission rates in Missouri schools.

MODESE will continue to issue updated guidance related to operating schools safely. The grid below lists actions taken by MODESE in regard to maintaining public health.

Mitigation Strategy	SEA Response
Universal and correct wearing of masks	 Issued state guidance recommending schools implement local mask mandates Collaborated with the Missouri Hospital Association for the "Mask Up" campaign Included CDC information on correct/proper use of masks in state guidance document Shared information from infectious disease experts on monthly webinars to discuss the ongoing evidence to support masking as an effective mitigation strategy in schools Distributed 8.6 million masks in conjunction with State Emergency Management Agency Provided grant funding to support local purchase of masks
Physical distancing (e.g., including use of cohorts/podding)	 Issued state guidance recommending schools implement physical distancing strategies (i.e. cohorting of students, staggered bus routes, hybrid learning models, etc.) Shared information from infectious disease experts on monthly webinars to discuss the ongoing evidence to

Table B1.

Mitigation Strategy	SEA Response
	 support physical distancing as an effective mitigation strategy in schools Approved 555 AMI-X plans to ensure distancing while preserving instruction
Handwashing and respiratory etiquette	 Issued state guidance recommending schools clearly communicate with students and staff the importance of proper hand-washing and respiratory etiquette Shared information from infectious disease experts on monthly webinars to discuss the ongoing evidence to support proper hand hygiene and respiratory etiquette as an effective mitigation strategy in schools Provided grant funding to support local purchase of hand sanitizer and other hygiene needs
Cleaning and maintaining healthy facilities, including improving ventilation	 Issued state guidance recommending schools develop a robust protocol to ensure surfaces were sanitized appropriately Issued state guidance recommending schools clearly communicate with students and staff the importance of staying home from school when they were ill Shared information from infectious disease experts on monthly webinars to discuss the ongoing evidence to support proper cleaning efforts as an effective mitigation strategy in schools Provided grant funding to support local purchase of additional personnel, equipment, and materials to clean schools
Contact tracing in combination with isolation and quarantine, in collaboration with the State, local, territorial, or Tribal health departments	 Provided guidance for the use of homebound instructions status for students quarantining Issued state guidance recommending schools develop a strategy to quickly assist local public health officials with contact tracing efforts, which included seating charts, class rosters, etc. Shared information from infectious disease experts on monthly webinars to discuss the importance of contact tracing quickly and effectively as a mitigation strategy in schools Provided grant funding to support LEAs hiring additional personnel to assist with contact tracing efforts
Diagnostic and screening testing	 Issued state guidance recommending schools develop a testing strategy to support in-person learning efforts Developed the Missouri K-12 BinaxNOW Antigen Testing program with the MODHSS to distribute rapid antigen test cards to LEAs who applied to participate Evolved antigen testing program to include screening/asymptomatic testing in 2021 Collaborated with MODHSS to explore screening testing options for the 2021-22 school year to offer a wide variety of options for LEAs to select the testing support most needed for their LEA Shared information from infectious disease experts on monthly webinars to discuss the importance of testing as a mitigation strategy in schools

Mitigation Strategy	SEA Response
	• Provided grant funding to support LEA testing strategies, needs, etc.
Efforts to provide vaccinations to educators, other staff, and students, if eligible	 Advocated for educators and school personnel to be among critical infrastructure employees prioritized for vaccination Promoted statewide vaccination events Shared information from infectious disease experts on monthly webinars to discuss the importance of vaccination as a mitigation strategy in schools
Appropriate accommodations for children with disabilities with respect to the health and safety policies	 Issued question and answer guides for distance learning for children with disabilities Distributed guidance issued by the Office of Special Education Programs (OSEP) regarding educating children with disabilities Issued follow-up question and answer guidance to OSEP guidance Provided all LEAs access to LRP Publications

ii. Any Statewide plans, policies, estimated timelines, and specific milestones related to reopening and operation of school facilities, including any mechanisms the SEA will use to track, monitor, or enforce their implementation;

Response As stated at the beginning of this application, Missouri is a local control state, in which decisions about reopening schools are made by local leaders. School leaders work closely with local public health authorities. The first LEA opened on August 11, 2020 implementing onsite instruction. By September 13, 2020, all LEAs were open, with over 89% offering onsite options. Even at the peak, only 25 percent of LEAs were fully remote. At the close of the 2020-21 school year, 99.5 percent of LEAs were offering onsite learning opportunities. The vast majority of Missouri's LEAs were never fully remote during 2020-21. Even so, some parents opted for distanced instruction in these schools. In terms of state-tostate comparisons, Missouri has the 6th lowest proportion of remote learners, the 8th lowest proportion of hybrid learners, and the 5th highest proportion of inperson learners, according to the American Enterprise Institute's Return to Learn Tracker. During 2020-21, many LEAs offered some form of hybrid instruction (alternating days of in-person and distanced instruction). Their ability to do so was based on emergency and regular state regulations enabling hybrid instruction to protect the health and safety of the entire school population through reduced numbers of students and staff onsite. The emergency regulation has expired and the regular regulation is set to expire on July 30, 2021. LEAs are allowed to deliver hybrid instruction during summer school until the regulation expires. MODESE's current expectation is that all Missouri LEAs will offer full-time onsite instruction in the fall of 2021 to all families who desire that mode of instruction.

MODESE created a dynamic map that shows the pattern of instruction for every LEA, dating back to the start of the 2020-21 school year. The map can be found <u>here</u>. Missouri is a local control state and as such, decisions to change patterns of instruction are made by local leaders.

iii. To what extent the SEA and its LEAs consult with Federal, State, and local health officials. This description should include, if available, whether the SEA and its LEAs have received support for screening testing from their State or local health department based on funding awarded by the CDC; and

Response MODESE regularly consults with the MODHSS, as well as experts in pediatric infectious disease from Children's Mercy Kansas City and Washington University/St. Louis Children's Hospital. These consultations produced guidance in the form of documents and webinars for the field. Using Coronavirus Relief Funds, MODESE has collaborated with the MODHSS to provide masks, hand sanitizer, and rapid antigen test kits for LEAs. MODESE provided support for testing and the reporting of the antigen testing results on a statewide basis. It is noteworthy that select Missouri LEAs participated in a national study with the CDC and Washington University regarding mitigation strategies and transmission rates in schools⁸.

LEAs consult primarily with their local health officials. This consultation is the basis for any decisions to close schools and, to some extent, support for antigen testing, contact tracing, and vaccine access.

iv. Any guidance, professional learning, and technical assistance opportunities the SEA will make available to its LEAs.

Response Beginning in March 2020, MODESE published its <u>Coronavirus (COVID-19)</u> <u>Information webpage</u>. The webpage includes guidance documents, additional resources, and links to other agencies, information, etc. MODESE has produced the Missouri School Reopening and Operating Guidance, a living document that has been updated six times since August 2020, to provide LEAs with timely and accurate information regarding best practices for school operations. Since March 2020, MODESE has hosted well over 100 webinars and virtual meetings for schools, school leaders, and various education stakeholders. These webinars and virtual meetings provide the most recent information from the CDC, MODHSS,

⁸ Dawson, P., Worrell, M.C., et al. (2021). Pilot Investigation of SARS-CoV-2 Secondary Transmission in Kindergarten Through Grade 12 Schools Implementing Mitigation Strategies — St. Louis County and City of Springfield, Missouri, December 2020. *Centers for Disease Control*. Retrieved from

https://www.cdc.gov/mmwr/volumes/70/wr/mm7012e4.htm May 25, 2021.

and consultation with experts in pediatric infectious disease from Washington University St. Louis Children's Hospital, and Children's Mercy Kansas City. The most recent webinars and webinar materials are located <u>here</u> and can be accessed through links at the bottom of the page. MODESE will continue to provide updated materials and webinars to keep the field informed.

- 2. Safe Return to In-Person Instruction and Continuity of Services Plans: Describe how the SEA will ensure that its LEAs that receive ARP ESSER funds meet the requirements in section 2001(i) of the ARP Act and the requirements relating to the ARP ESSER funds published in the Federal Register and available at https://oese.ed.gov/offices/american-rescue-plan/american-rescue-plan-elementary-and-secondary-school-emergency-relief/ (ARP ESSER requirements) to either: (a) within 30 days of receipt of the funds, develop and make publicly available on the LEA's website a plan for the safe return to in-person instruction and continuity of services, or (b) have developed and made publicly available on the LEA's website such a plan that meets statutory requirements before the enactment of the ARP Act, including:
 - i. How the SEA will ensure that each LEA plan includes, or will be modified to include, the extent to which it has adopted policies and a description of any such policies on each of the strategies listed in table B1;
 - ii. How the SEA will ensure that each LEA plan describes how it will ensure continuity of services including but not limited to services to address the students' academic needs, and students' and staff social, emotional, mental health, and other needs, which may include student health and food services;
 - iii. How the SEA will ensure that the LEA periodically reviews, no less frequently than every six months for the duration of the ARP ESSER grant period (i.e., through September 30, 2023),⁹ and revises as appropriate, its plan, and how the SEA will ensure that the LEA seeks public input, and takes such input into account on (1) whether revisions are necessary and, if so, (2) the revisions to the plan; and
 - iv. Describe, to the extent the SEA collects it, information about LEA implementation, to the greatest extent practicable, of each element of the most up-to-date CDC guidance listed in table B1 and its LEAs' needs for support and technical assistance to implement strategies consistent, to the greatest extent practicable, with relevant CDC guidance.

Response MODESE has made significant efforts in offering guidance to the field in regard to safe school operations during the pandemic. As mentioned earlier, MODESE

⁹ ARP ESSER funds are subject to the Tydings amendment in section 421(b) of the General Education Provisions Act, 20 U.S.C. 1225(b), and are therefore available to SEAs and LEAs for obligation through September 30, 2024. Review and revisions of these plans, if necessary, are not required during the Tydings period.

will continue to update its guidance as conditions warrant. As part of the process for administering ARP ESSER funds, MODESE will host webinars, issue guidance, and offer technical assistance as needed to ensure schools have access to the most current information. These webinars will be recorded and guidance published to ensure that information is available at any time.

Because so many schools in Missouri have been offering onsite instruction during the 2020-21 school year, MODESE believes that many, if not most, LEAs have existing Safe Return to In-Person Instruction plans that satisfy the requirements of section 2001(i) of the ARP Act. MODESE will require that LEAs include a hyperlink to their Safe Return to In Person Instruction Plan when LEAs submit their ARP ESSER plans to MODESE. MODESE staff will review these plans for completeness and to determine if LEAs are meeting the requirements of i and ii (above) before awarding the final one-third of the APR ESSER allocations. Technical assistance will be offered to LEAs that do not satisfy this requirement in their plan submission.

MODESE does not currently collect information on the implementation of COVID-19 mitigation strategies in LEAs. However, technical assistance publications are available <u>here</u>. MODESE's field staff of Area Supervisors of Instruction will also provide consultation and technical assistance.

MODESE will use its Tiered Monitoring (TM) system, discussed in more detail later, to ensure that LEAs review, and, if necessary, revise, their Safe Return to In-Person Instruction and Continuity of Service plans at least every six months. The system will require LEAs to supply their most recent meeting date, supported by sign-in sheets and minutes, the status of any revision, and current link to the plan.

C. Planning for the Use and Coordination of ARP ESSER Funds

The Department recognizes that seeking input from diverse stakeholders is essential to developing plans for the use of ARP ESSER funds that are responsive to the needs of students, families, and educators. In this section, SEAs will describe their plans for consultation and for coordinating the use of ARP ESSER funds with other resources to meet the needs of students.

- 1. <u>SEA Consultation</u>: Consistent with the ARP ESSER requirements, describe how the SEA engaged in meaningful consultation with stakeholders, and incorporated input into its plan, including, but not limited to:
 - i. students;
 - ii. families;
 - iii. Tribes (if applicable);
 - iv. civil rights organizations (including disability rights organizations);

	 v. school and district administrators (including special education administrators); vi. superintendents; vii. charter school leaders (if applicable); viii. teachers, principals, school leaders, other educators, school staff, and their unions; and ix. stakeholders representing the interests of children with disabilities, English learners, children experiencing homelessness, children and youth in foster care, migratory students, children who are incarcerated, and other underserved students. The description must include how the SEA provided the public the opportunity to provide input in the development of the plan, a summary of the input (including any letters of support), and how the SEA took such input into account.
Response	As noted earlier, MODESE has been regularly consulting with a variety of stakeholders. Regular weekly, bi-weekly, and monthly meetings occur with the Commissioner's Advisory Committee, the Education Roundtable, the Commissioner's Teacher Advisory Committee, and with leaders of education organizations. These meetings include the exchange of information through interactive webinars, and soon the exchange will be through in-person meetings. In addition to these regular consultations in which student and LEA needs are discussed, MODESE augmented its consultation process by the use of a survey. The survey was sent to all LEAs, and over 100 additional stakeholders, with nearly 3,100 responses. Responses came from all applicable stakeholder groups listed above and additionally, from education organizations.
	 The results of the survey are summarized as follows. Respondents indicated that the top five groups most impacted by the pandemic are: Children from low-income families; Elementary students; Children with disabilities; High school students; and Children and youth experiencing homelessness. Regardless of the group identified as most impacted, respondents indicated a strong need for improved access to broadband, tutoring, and instructional materials. Respondents also expressed the need for a tool or resource to gauge students' social, emotional, and mental health needs and greater access to mental health professionals. As further analysis is completed, MODESE will consider how best to meet the needs expressed in the survey. In the area of teacher recruitment and retention, survey respondents indicated support for teachers, particularly in the area of improving teacher pay.

- 2. <u>Coordinating Funds</u>: Describe to what extent the SEA has and will coordinate Federal COVID-19 pandemic funding and other Federal funding. This description must include:
 - i. How the SEA and its LEAs 1) are using or have used prior to the submission of this plan and 2) plan to use following submission of this plan, Federal COVID-19 funding under the Coronavirus Aid, Relief, and Economic Security ("CARES") Act and the CRRSA Act to support a safe return to and safely maximize in-person instruction, sustain these operations safely, and address the disproportionate impact of the COVID-19 pandemic on individual student groups (including students from low-income families, children with disabilities, English learners, racial or ethnic minorities, students experiencing homelessness, children and youth in foster care, and migratory students);

Funding source	Prior/current SEA and LEA uses (including funding amounts, if applicable)	Planned SEA and LEA uses (including funding amounts, if applicable)
ESSER I (CARES Act)	 LEA Allocations \$192,131,014 Digital Divide Grants \$5,946,505 Teacher Training, Recruitment & Retention Grants \$7,935,256 Trauma-Informed Schools \$1,515,574 Longitudinal Data System \$105,797 Administrative Costs \$715,481 Impact Analysis \$93,673 	All funds allocated
GEER I (CARES Act)	 Digital Divide Grants \$14,741,339 Transportation Grants \$15,258,661 	All funds allocated
ESSER II (CRRSA Act)	 LEA Allocations \$784,055,062 Teacher Recruitment & Retention Grants \$21,399,240 	 Digital Divide Grants \$30,000,000 Longitudinal Data System \$4,300,000 Assessment System Redesign \$15,000,000 Administration \$3,517,989 Reading and Math Specialists \$4,600,000 State Operated Schools Safety & Security \$2,000,000 Student Recovery and Re- engagement \$4,800,000

Response

Table C1.

Funding source	Prior/current SEA and LEA uses (including funding amounts, if applicable)	Planned SEA and LEA uses (including funding amounts, if applicable)
Homeless I and II (ARP)		 New Homeless Grant Competition \$2,403,059 State Reservation \$801,020: Develop New Automated Homeless Identification System Four Regional Homeless Summits Contract for Onsite Follow Up Contract for Location of Students Who Have Disengaged

- ii. To what extent ESSER I and ESSER II funds have been awarded to LEAs and, if funds have not yet been made available to LEAs, when they will be. In addition, please provide any available information on the total dollar amounts of ESSER I and ESSER II funds that have been obligated but not expended by the SEA and its LEAs, including whether the SEA is able to track LEA obligations.
- Response All ESSER I funds have been allocated and awarded to LEAs. MODESE has full legislative authority to spend these funds. ESSER II funds have been allocated and awarded to LEAs. However, MODESE has only been authorized to spend \$522,703,375 during FY 21, with the remaining amount appropriated for FY 22. Allocation amounts are posted <u>here</u>. MODESE does not track LEA obligations. LEAs assure obligation timelines are met through a certification process during the budget application submission. To date, LEAs have expended approximately 84 percent of ESSER I funds. LEAs began requesting reimbursement of ESSER II funds on June 1.

The amounts in the following table are included in the previous table. The remaining obligations for State Reserve funds from ESSER I include:

Project	Obligation
Distance Education Professional Development	\$8,000
Missouri Student Connectivity	\$3,984,221
Trauma-Informed Schools	\$664,725
Teacher Recruitment & Retention grants	\$7,935,256
Longitudinal Data System	\$49,615
Administrative Costs	\$204,943
Impact Analysis	\$93,673

The tentatively planned obligations for State Reserve funds from ESSER II include:

Allocation
\$30,000,000
\$21,399,240
\$4,300,000
\$3,517,989
\$4,600,000
\$2,000,000
\$4,800,000
\$15,000,000
\$1,500,000

iii. In supporting LEAs as they plan for the safe return to and continuity of in-person instruction and for meeting the academic, social, emotional, and mental health needs of students resulting from the COVID-19 pandemic, the extent to which the SEA is also using other Federal funding sources including but not limited to under the Elementary and Secondary Education Act of 1965 ("ESEA"), IDEA, Workforce Innovation and Opportunity Act ("WIOA"), funding for child nutrition services, and McKinney-Vento Homeless Assistance Act, and the funds to support the needs of students experiencing homelessness provided by section 2001(b)(1) of the ARP Act.¹⁰

Response	MODESE has taken an active approach to providing additional funding to LEAs
	through a variety of sources. These sources and uses include the following:

Source	Use
Coronavirus Relief Fund	Missouri Student Connectivity-Access
	Grant (perimeter Wi-Fi at every school
	building)
Coronavirus Relief Fund	COVID-19 Response Supply
	Reimbursement Grant (PPE and cleaning
	supply grants)
Coronavirus Relief Fund	K-12 Support (grant with additional
	support to public LEAs)

¹⁰ Please note that the needs of students experiencing homelessness must be addressed (along with the other groups disproportionately impacted by the COVID-19 pandemic) through the use of the ARP ESSER SEA reservations and the required LEA reservation for the academic impact of lost instructional time; the funding provided to support the needs of students experiencing homelessness by section 2001(b)(1) of the ARP Act is <u>in addition to</u> the supports and services provided with ARP ESSER funds.

Source	Use
Coronavirus Relief Fund	Emergency Worker Childcare
	reimbursements
Coronavirus Relief Fund	Transportation for Meal Delivery Grant
GEER Fund	Transportation Supplement Grant
GEER Fund	Missouri Student Connectivity-
	Connections Grant (Wi-Fi enabled devices
	for students)
National School Lunch Program	Seamless Summer Option Meals
School Breakfast Program	Afterschool Snack Program

D. Maximizing State-Level Funds to Support Students

The Department recognizes that States have an extraordinary opportunity to address the disproportionate impact of the COVID-19 pandemic on underserved students through the ARP Act's required State set-asides to address the academic impact of lost instructional time, provide summer learning and enrichment programs, and provide comprehensive afterschool programs. In this section, SEAs will describe their evidence-based strategies for these resources.

- 1. <u>Academic Impact of Lost Instructional Time</u>: Describe how the SEA will use the funds it reserves under section 2001(f)(1) of the ARP Act (totaling not less than 5 percent of the State's total allocation of ARP ESSER funds) on evidence-based interventions to address the academic impact of lost instructional time by supporting the implementation of evidence-based interventions, such as summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs, and ensure that such interventions respond to students' academic, social, emotional, and mental health needs. The description must include:
 - i. A description of the evidence-based interventions (e.g., providing intensive or high-dosage tutoring, accelerating learning) the SEA has selected, and the extent to which the SEA will evaluate the impact of those interventions on an ongoing basis to understand if they are working;
- Response As explained in Section A., MODESE will continue to support principals through expansion of the MLDS. If schools are to effectively implement the adaptive changes needed, it is clear that all principals, not just half, must be trained to lead change. Second, MODESE plans to place content area specialists in each of the nine Regional Professional Development Centers (RPDCs). Depending on spending authority, MODESE is tentatively planning to place three specialists in English language arts, three specialists in mathematics, and one specialist in

reading in each RPDC. The content area specialists will support both effective pedagogy and the use of priority standards. The reading specialist will support training in the *science of reading* as well as providing training for dyslexia screening.

Identifying priority standards and the provision of MO LEAP benchmark assessments and instructional materials is the beginning of what is needed in the area of what to teach. MODESE's strategic planning process focused strongly on ensuring that every student can read by the end of second grade. To measure progress for this important goal, MODESE will develop or select a reading foundations assessment to be added to the state's assessment system. Further, to better prepare students for life beyond high school, MODESE is working to develop competency-based learning (CBL) in Missouri. MODESE recently collaborated with SchoolSmart KC, a non-profit that supports schools, to examine the advisability of implementing CBL in Missouri. The collaboration resulted in a presentation to the SBE and a whitepaper, produced by Bellwether Education Partners. While research on CBL is still in its early stages, it indicates that when CBL is well-implemented, it is effective for all students and particularly for those who are underserved. These factors combine to compel MODESE to refine the summative assessment system to measure early reading skills, to fully align to the priority standards and be competency-based. This direction for refining the assessment system fully aligns with recommendations made by the Commissioner's Policy Advisory Panel, a group of diverse stakeholders, business leaders, and government officials convened and moderated by the Hunt Institute.

As noted earlier, technology resources, both internal to MODESE and for students across the state is the third major priority for MODESE. First, students must have access to digital learning resources. Funds under ARP ESSER present a significant opportunity to improve the availability and affordability of broadband. Rural settings lack fiber optic infrastructure needed for high-speed internet to be available. In some rural settings, and many urban ones, high-speed internet may be present but is not affordable for many families.

Finally, as noted earlier, MODESE needs to upgrade its own data system to ensure the availability and usability of data needed for policy decision-making, resource allocation, and public reporting. This will include hardware and software upgrades as well as the implementation of Ed-Fi®, Common Education Data Standards (CEDS), and School Codes for Exchange of Data (SCEDS) protocols.

In summary, MODESE has identified priority areas and action plans that will support student learning. This includes providing leadership development for all principals, additional instructional specialists to support educators, the expansion of the DCI system with its common formative assessments, the redesign of the assessment system to focus on reading, priority standards, and CBL. MODESE will also explore ways in which resources are available to gauge and meet the social, emotional, and mental health needs of students.

		MODESE is committed to developing broadband availability for students and improving its data capacity. This will improve access to digital learning resources for those most in need and will ensure MODESE's timely and accurate analysis of the effects of interventions during the pandemic. When the data for 2020-21 are complete, significant additional analysis must be undertaken. This analysis will inform decision-making about additional needed interventions, policy, and resource deployment.
		 How the evidence-based interventions will specifically address the disproportionate impact of COVID-19 on certain groups of students, including each of the student groups listed in question A.3.iviii. When possible, please indicate which data sources the SEA will use to determine the impact of lost instructional time; and
Response		In Sections A and D, MODESE notes the need for complete data and additional analysis, to be performed during summer and fall 2021, before a complete understanding of the impact of COVID-19 on student groups. This analysis will inform decision-making about specific additional interventions that may be needed to meet the needs of all students, especially those disproportionately impacted by the COVID-19 pandemic.
		 iii. The extent to which the SEA will use funds it reserves to identify and engage 1) students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years; and 2) students who did not consistently participate in remote instruction when offered during school building closures.
Response		Also as noted in Sections A and D, complete data and analysis is needed before MODESE makes any final determinations on the impact of and interventions needed for students who have experienced the greatest loss of instructional time. At a minimum, DESE will use enrollment, course completion, and assessment data to establish the degree to which students have been disengaged from schools. Additional measures may be taken to support LEAs in re-engaging those students.
	2.	<u>Evidence-Based Summer Learning and Enrichment Programs</u> : Describe how the SEA will use the funds it reserves under section 2001(f)(2) of the ARP Act (totaling not less than 1 percent of the State's total allocation of ARP ESSER funds) for evidence-based summer learning and enrichment programs, including those that begin in Summer 2021, and ensure such programs respond to students'

	academic, social, emotional, and mental health needs. The description must include:
	 A description of the evidence-based programs that address the academic, social, emotional, and mental health needs of students (e.g., providing intensive or high-dosage tutoring, accelerating learning) the SEA has selected, and the extent to which the SEA will evaluate the impact of those programs;
Response	As of this application submission, MODESE is awaiting spending authority from the Missouri legislature for ARP ESSER funds. Therefore, MODESE will determine the best use of its reserve funds to support summer learning for summer 2022 following the data analysis mentioned previously. MODESE may consider subsidizing or incentivizing summer school programming and may also consider the promotion of high-dosage tutoring. To ensure that the acceleration of student learning is not delayed, MODESE has encouraged LEAs to consider using local allocations of CRRSA ESSER (ESSER II) funds for summer learning in 2021.
	ii. How the evidence-based programs will specifically address the disproportionate impact of COVID-19 on certain groups of students, including each of the student groups listed in question A.3. iviii. When possible, please indicate which data sources the SEA will use to identify students most in need of summer learning and enrichment programs; and
Response	As noted in Sections D.1.i, ii, and iii and D.2.i, MODESE has not fully determined what additional actions will be taken beyond its current commitments to improving instruction for all students, and particularly individual student groups impacted. Once data analysis is complete, those decisions will be made.
	iii. The extent to which the SEA will use funds it reserves to identify and engage 1) students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years; and 2) students who did not consistently participate in remote instruction when offered during school building closures.
Response	Also as noted in Sections A and D.1.iii., complete data analysis is needed before MODESE makes any final determinations on the impact of and interventions needed for students who have been disengaged from school. The analysis noted above will be used to inform how MODESE will support LEAs in re-engagement for summer school 2022. As noted elsewhere, MODESE currently lacks appropriation authority for ARP ESSER funds, preventing its use for 2021. However, MODESE has encouraged LEAs to use CRRSA ESSER (ESSER II) funds for summer school 2021.

- 3. Evidence-Based Comprehensive Afterschool Programs: Describe how the SEA will use the funds it reserves under section 2001(f)(3) of the ARP Act (totaling not less than 1 percent of the State's total allocation of ARP ESSER funds) for evidence-based comprehensive afterschool programs (including, for example, before-school programming), and ensure such programs respond to students' academic, social, emotional, and mental health needs. The description must include:
 - i. A description of the evidence-based programs (e.g., including partnerships with community-based organizations) the SEA has selected, and the extent to which the SEA will evaluate the impact of those programs;
- Response MODESE will expand its afterschool program through grants or contracts designed to support student's academic, social, emotional, and mental health needs. Currently, the Missouri 21st Century Community Learning Center program, an evidence-based afterschool program, has a competitive application cycle open. MODESE will consider using these funds to support additional quality applicants from this or a future competition (either directly to LEAs or to community/faith-based entities) and/or to initiate contracts to existing programs to expand their afterschool programming. As noted elsewhere in this plan, the timing of spending authority will affect the details of implementation. MODESE will evaluate the impact of these new awards consistent with its evaluation of regularly funded programs.
 - How the evidence-based programs will specifically address the disproportionate impact of COVID-19 on certain groups of students, including each of the student groups listed in question A.3.i.-viii.
 When possible, please indicate which data sources the SEA will use to identify students most in need of comprehensive afterschool programming; and
- Response Local programs will provide activities to address the unique needs of low-income students, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and foster care youth. Local programs will report how outreach and service delivery will meet the needs of each population. MODESE will consider the need for and specifics of priority preferences following further data analyses.
 - iii. the extent to which the SEA will use funds it reserves to identify and engage 1) students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years; and 2) students

		who did not consistently participate in remote instruction when offered during school building closures. Depending on the method(s) of expansion selected in D.3.i., MODESE will include in its evaluation of grant applications the degree to which applicants emphasize the identification and engagement of disengaged students, and/or will use the contractual process to address this need.
	4.	Emergency Needs: If the SEA plans to reserve funds for emergency needs under section 2001(f)(4) of the ARP Act to address issues responding to the COVID-19 pandemic, describe the anticipated use of those funds, including the extent to which these funds will build SEA and LEA capacity to ensure students' and staff's health and safety; to meet students' academic, social, emotional, and mental health needs; and to use ARP ESSER funds to implement evidence-based interventions.
Response		MODESE will comply with statutory reservation requirements and will reserve two and one-half percent of the state allocation for emerging needs. Determinations of use will follow further data analysis.

E. Supporting LEAs in Planning for and Meeting Students' Needs

The Department recognizes that the safe return to in-person instruction must be accompanied by a focus on meeting students' academic, social, emotional, and mental health needs, and by addressing the opportunity gaps that existed before – and were exacerbated by – the pandemic. In this section, SEAs will describe how they will support their LEAs in developing high-quality plans for LEAs' use of ARP ESSER funds to achieve these objectives.

- 1. <u>LEA Plans for the Use of ARP ESSER Funds</u>: Describe what the SEA will require its LEAs to include in LEA plans consistent with the ARP ESSER requirements for the use of ARP ESSER funds, how the SEA will require such plans to be made available to the public, and the deadline by which the LEA must submit its ARP ESSER plan (which must be a reasonable timeline and should be within no later than 90 days after receiving its ARP ESSER allocation). The LEA plans must include, at a minimum:
 - i. The extent to which and how the funds will be used to implement prevention and mitigation strategies that are, to the greatest extent practicable, in line with the most recent CDC guidance, in order to continuously and safely operate schools for in-person learning;
 - ii. How the LEA will use the funds it reserves under section 2001(e)(1)
 of the ARP Act (totaling not less than 20 percent of the LEA's total allocation of ARP ESSER funds) to address the academic impact of lost instructional time through the implementation of evidence-based

		 interventions, such as summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs; iii. How the LEA will spend its remaining ARP ESSER funds consistent with section 2001(e)(2) of the ARP Act; and iv. How the LEA will ensure that the interventions it implements, including but not limited to the interventions under section 2001(e)(1) of the ARP Act to address the academic impact of lost instructional time, will respond to the academic, social, emotional, and mental health needs of all students, and particularly those students disproportionately impacted by the COVID-19 pandemic, including students from low-income families, students of color, English learners, children with disabilities, students experiencing homelessness, children and youth in foster care, and migratory students.
Response		 MODESE will require LEAs to submit an ARP ESSER application that includes the link to the LEA's Safe Return to In-Person Instruction and Continuity of Service Plan. The final submission will include a spending plan and budget that addresses the mitigation and prevention strategies. The ARP ESSER application will also contain a section in which the LEA will be required to provide detail on how it will spend a minimum of 20 percent of its allocation to address the impact of lost instructional time through evidence-based interventions. Finally, the ARP ESSER application will require LEAs to provide detail on how it will spend the remaining funds. The ARP ESSER application and/or the associated guidance will include a list of allowable uses and the associated expenses planned for each use. The LEA will provide a description of the LEA will use to ensure its interventions address the needs of students.
	2.	 LEA Consultation: Describe how the SEA will, in planning for the use of ARP ESSER funds, ensure that, consistent with the ARP ESSER requirements], its LEAs engage in meaningful consultation with stakeholders, including, but not limited to: students; families; school and district administrators (including special education administrators); and teachers, principals, school leaders, other educators, school staff, and their unions. The LEA must also engage in meaningful consultation with each of the following to the extent present in or served by the LEA: Tribes;

		 ii. civil rights organizations (including disability rights organizations); and iii. stakeholders representing the interests of children with disabilities, English learners, children experiencing homelessness, children and youth in foster care, migratory students, children who are incarcerated, and other underserved students. The description must also include how the SEA will ensure that LEAs provide the public the opportunity to provide input in the development of the LEA's plan for the use of ARP ESSER funds and take such input into account.
Response		MODESE's ARP ESSER guidance and LEA application for funds under ARP ESSER will include the specific consultation requirements under the law and the Interim Final Requirements. MODESE will require that LEAs assure that they have engaged in consultation with the required, and other entities as applicable, listed in Question E.2. LEAs may consult through surveys, meetings, and or comment periods. LEAs will also need to assure that they have consulted with Tribes (if applicable), civil rights organizations, and stakeholders representing the interests of students to the extent they are present in or served by the LEA.
	3.	 Describe how the SEA will support and monitor its LEAs in using ARP ESSER funds. The description must include: How the SEA will support and monitor its LEAs' implementation of evidence-based interventions that respond to students' academic, social, emotional, and mental health needs, such as through summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs – including the extent to which the SEA will collect evidence of the effectiveness of interventions employed;
Response		MODESE will provide an ARP ESSER guidance document to LEAs that will support the LEAs' selection of evidence-based interventions. The ARP ESSER application will be structured to provide guidance to LEAs as they select and implement evidence-based interventions to respond to students' needs. MODESE will monitor the LEAs through our Tiered Monitoring (TM) System. MODESE's TM System will provide a stem statement that the LEA will respond to in one of four ways: "Yes the LEA meets the requirement"; "No, the LEA does not meet the requirement"; "The LEA is resolving any issues to meet the requirement"; or "The requirement is not applicable to the LEA".
		The TM System will require the LEA to upload the evidence source to document meeting the requirement of the stem statement. Staff will monitor LEA submissions and evidence sources. Technical assistance will be provided to any LEAs that indicate they are not meeting or are resolving issues to meet the standard.

MODESE will review the evidence-based interventions implemented by the LEAs. MODESE may identify selected interventions for which additional effectiveness data will be collected and evaluated.

ii. How the SEA will support and monitor its LEAs in specifically addressing the disproportionate impact of the COVID-19 pandemic on certain groups of students, including each of the student groups listed in question A.3.i.-viii; and

Response The ARP ESSER application will prompt LEAs to identify the group or groups disproportionately impacted locally. The LEA will then be asked to identify the intervention or interventions selected to address the group or groups' needs. If the LEA has not yet identified the disproportionately impacted group(s), the LEA will be prompted to indicate how they will make the identification and select the intervention(s).

- iii. How the SEA will support and monitor its LEAs in using ARP
 ESSER funds to identify, reengage, and support students most likely
 to have experienced the impact of lost instructional time on student
 learning, such as:
 - a. Students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years;
 - b. Students who did not consistently participate in remote instruction when offered during school building closures; and
 - c. Students most at-risk of dropping out of school.

Response The ARP ESSER application will prompt LEAs to identify students who have experienced the greatest impact of lost instructional time. The LEA will then be prompted to identify the actions it will take to re-engage and support those students. If the LEA has not yet identified the students experiencing the greatest impact of lost instructional time, they will be prompted to indicate how they will make the identification and select the intervention(s). As noted previously, the TM System will be used to monitor LEAs.

- 4. Describe the extent to which the SEA will support its LEAs in implementing additional strategies for taking educational equity into account in expending ARP ESSER funds, including but not limited to:
 - i. Allocating funding both to schools and for districtwide activities based on student need, and
 - ii. Implementing an equitable and inclusive return to in-person instruction. An inclusive return to in-person instruction includes, but is not limited to, establishing policies and practices that avoid the

 over-use of exclusionary discipline measures (including in- and outof-school suspensions) and creating a positive and supportive learning environment for all students.
 Response The LEA ARP ESSER application provided by MODESE will ask LEAs to explain how it will allocate funds based on student need. Further, LEAs will be asked to explain how they have already or will implement an equitable and inclusive return to in-person instruction. The guidance document will include clarifying examples of how an LEA may implement such actions.

F. Supporting the Educator Workforce

The Department recognizes the toll that the COVID-19 pandemic has taken on the Nation's educators as well as students. In this section, SEAs will describe strategies for supporting and stabilizing the educator workforce and for making staffing decisions that will support students' academic, social, emotional, and mental health needs.

- 1. Supporting and Stabilizing the Educator Workforce:
 - i. Describe the extent to which the State is facing shortages of educators, education administration personnel, and other school personnel involved in safely reopening schools, and the extent to which they vary by region/type of school district and/or groups of educators (e.g., special educators and related services personnel and paraprofessionals; bilingual or English as a second language educators; science, technology, engineering, and math ("STEM") educators; career and technical education ("CTE") educators; early childhood educators). Cite specific data on shortages and needs where available.
- Response For the 2020-21 school year, the following data provides the degree of shortage of educators by general area. MODESE does not collect data on shortages of other professional or support staff.

Area	Data on Shortages and Needs
Sciences (MS Science, Biology,	329.2 total FTE vacancies, 45.7 left
Earth Science, Chemistry, and	vacant or filled with less-than-fully
Physics)	certified teachers (13.9%)
Secondary STEM (Biology,	480.3 total FTE vacancies, 64.2 left
Chemistry, Earth Science, Physics,	vacant or filled with less-than-fully
Industrial Technology, Technology	certified teachers (13.4%)
Education, and Math)	

Table F1.

STEM (Middle School (MS) Science, MS Math, Biology, Earth Science, Chemistry, Physics, High School (HS) Math, Industrial Technology, and Technology Education)833.0 total FTE vacancies, 107.4 left vacant or filled with less-than-fully certified teachers (12.9%)Music (Vocal and Instrumental)236.1 total FTE vacancies, 29 left vacant or filled with less-than- fully certified teachers (12.3%)World Languages (French, Spanish, German, Latin, and Other)236.1 total FTE vacancies, 101 total FTE vacancies, 11 left vacant or filled with less-than- fully certified teachers (12.2%)Mathematics (MS and HS)448.9 total FTE vacancies, 46.8 left vacant or filled with less-than-fully certified teachers (10.4%)Special Education (Early Childhood Special Education, Mild/Moderate Cross Categorical, Severe Developmental Disabilities, Blind and Low Vision, and Deaf and Hard of Hearing)305.7 total FTE vacancies, 20.9 left vacant or filled with less-than-fully certified teachers (6.8%)Personnel Pupil Services (Elementary and Secondary Counselor, School Psychologist)305.7 total FTE vacancies, 20.9 left vacant or filled with less-than-fully certified teachers (6.2%)Middle School STEM (Math and Science)352.7 total FTE vacancies, 15 left vacant or filled with less-than-fully certified teachers (3.4%)Administration (Assistant Superintendent, Career Education Director, Elementary Assistant Principal, Secondary Assistant Principal, Secondary Assistant Principal, Secondary Principal, Special Education Administrator, and Superintendent)465.5 total FTE vacancies, 16 left vacant or filled with less-than- fully certified teachers (3.4%)	Area	Data on Shortages and Needs
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Education Administrator, and	Secondary Assistant Principal,	
	Secondary Principal, Special	
	Education Administrator, and	
	Superintendent)	

	ii.	Describe how the SEA will assist its LEAs in identifying the most urgent areas of shortages or potential shortages, with particular plans for individual LEAs facing the most significant needs (e.g., by avoiding layoffs, providing high-quality professional learning opportunities, and addressing the impact of stress or trauma on educators). Include a description of how other Federal COVID-19 funding (e.g., ESSER and GEER funds under the CARES Act and CRRSA Act) have already been used to avoid layoffs during the COVID-19 pandemic.		
Response	layoffs. Furt production o distanced en	R (CARES), MODESE encouraged LEAs to use funds to avoid her, MODESE funded the Missouri State Teacher of the Year group's f 10 hours of high-quality training on effective teaching in a vironment. Finally, MODESE used a portion of the state reserve to effects of stress on teachers through the trauma-informed school		
	MODESE will offer teacher retention grants to all LEAs. The application process that LEAs will complete to access funding to improve teacher retention includes a review of local data on teacher turnover as well as strategies the LEA will implement to address their own particular shortage areas. LEAs will monitor teacher turnover data to determine the effectiveness of these strategies. Information provided to LEAs about the application process includes research supported strategies that have a positive impact on teacher retention. The grant allocation process includes a provision to provide additional funds to those LEAs with harder to fill positions, such as LEAs serving higher numbers of students of color and students in poverty.			
	iii.	Describe the actions the SEA will take to fill anticipated gaps in certified teachers for the start of the 2021-2022 school year and to what extent the SEA will further support its LEAs in expanding the educator pipeline and educator diversity while addressing the immediate needs of students disproportionately impacted by the pandemic (e.g., recruiting teaching candidates to provide high- dosage tutoring or implementing residencies for teacher candidates).		
Response	The approact MODESE we these efforts narrative of the benefits of b	taking a multi-faceted approach to address gaps in certified teachers. h will address needs at all points in the teacher supply system. First, ill conduct a multi-year, statewide recruitment campaign to assist . The purpose of this campaign is to address challenges with the the teaching profession. Specifically, this campaign will highlight the eing a teacher in the state of Missouri and the critical and honorable paring the state's future workforce.		

This effort will be augmented by a simultaneous and unprecedented multi-million dollar teacher recruitment and retention investment, in the form of grants to every LEA and every educator preparation program in the state. The recruitment investment in the LEAs will take the form of Grow Your Own (GYO) grants. These grants are to establish or expand existing local GYO programs in each LEA to recruit high school students and other staff, like substitute teachers and paraprofessionals, into the preparation process for the teaching profession.

The purpose of establishing GYO grants is based on national research showing that 60 percent of teachers end up teaching within twenty miles of where they went to school. Said another way, the richest pool for future Missouri teachers for Missouri schools are sitting in high schools all across the state. These GYO programs will include strengthening partnerships with educator preparation programs, identifying and selecting individuals who possess characteristics consistent with high quality teachers, preparation and support activities that create high quality learning opportunities and experiences, and a specific process for evaluating the effectiveness of any of these GYO strategies and activities.

The recruitment investment in all educator preparation programs will take the form of teacher recruitment grants. These grants are to expand and improve educator preparation program recruitment efforts. Similar to the GYO grants, these teacher recruitment grants for educator preparation programs will include strengthening partnerships with LEAs, identifying and selecting individuals who demonstrate characteristics consistent with effective teaching, providing preparation and support activities for those individuals who have been recruited, and a specific and intentional process for evaluating the effectiveness of all teacher recruitment strategies and activities.

In addition to recruiting from LEAs, educator preparation programs will also expand and improve their recruitment efforts of individuals who have exited the PK-12 system into alternative programs. This simultaneous and unprecedented investment in recruitment efforts is focused on increasing the supply of new teachers for all LEAs in the state. But equally important is the recruitment of candidates that will diversify the teaching workforce, as well as candidates for hard-to-staff content areas like Math, Science, Special Education, etc. This need to diversify the workforce is a major priority for MODESE and for LEAs across the state and will therefore be an ultimate goal of this investment in teacher recruitment.

Addressing recruitment is one critical effort to ensure an adequate supply of teachers. The retention of teachers in the profession is a second and critical effort. Retention rates of teachers who have completed their third year and are continuing into year four are just 64 percent. Retention rates of teachers who have completed their fifth year of teaching and are continuing to year six falls to just 48 percent. It is the loss of these early career teachers that results in an annual hiring rate of over eleven percent and creates a demand for teachers that cannot be met

with Missouri's current supply of teachers coming out of educator preparation programs. The unprecedented multi-million dollar investment in teacher recruitment and retention will include funds to improve teacher retention in every LEA in the state.

The retention investment in the LEAs will take the form of teacher retention grants. LEAs will design a plan that invests funds in research supported activities that result in higher levels of teacher retention. Among others, these activities might include improvements to the LEA's mentor program, expanded opportunities for professional learning, or funding activities that increase opportunities for teacher voice and/or teacher leadership. The teacher retention grant allocations were determined by providing additional funds to LEAs who have higher percentages of students in poverty and students of color. Missouri data shows that LEAs with more students in poverty or of color have higher turnover rates, higher rates of vacant positions, and higher percentages of teachers with less than three years of experience. These LEAs in particular have been disproportionately impacted by the pandemic. The additional funds to these LEAs will ensure that students most impacted by the pandemic are receiving the most support.

In addition to the unprecedented investment in teacher recruitment and retention, MODESE will continue to offer 10 hours of free professional development produced by the Missouri State Teachers of the Year in critical areas as noted by teachers across the state as high areas of need. As noted earlier in this application, MODESE plans to place additional instructional specialists in reading and mathematics in every RPDC in the state.

As noted earlier in this application, research indicates that the quality of the principal is a critical factor for teachers. In fact, recent research based on the synthesis of two decades of research released by the Wallace Foundation this past spring found in part that "it is difficult to envision an investment with a higher ceiling on its potential return than a successful effort to improve leadership development." Two comprehensive evaluations of the MLDS conducted over the past two years have found it to be a highly successful leadership development system. As such, MODESE will increase the capacity of the MLDS to ensure that all principals in the state have opportunities for learning and support as they face the challenges ahead in this school year

 Staffing to Support Student Needs: Describe the extent to which the SEA has developed or will develop strategies and will support its LEAs in increasing student access to key support staff within school buildings, including school counselors, special education personnel, nurses, social workers, and psychologists (e.g. hiring additional personnel or freeing up these staff to focus on providing services to students).

MODESE is aware of the significant need for students to have access to key Response support staff. Several existing efforts have already begun to address this need. First, using the SEA reserve for ESSER I, MODESE awarded a contract to provide statewide training on trauma-informed practice. This contract continues to provide LEAs access to monthly training and support. Second, MODESE has working to develop partnerships with institutions that train mental health counselors. This partnership is pursuing a number of solutions to meet the social, emotional, and mental health needs in LEAs. Among them is a set of partnerships between institutions and LEAs that would allow mental health students from colleges or universities to satisfy their clinical hours through supervised onsite work with LEAs. Third, the GYO grants in LEAs and teacher recruitment grants for educator preparation programs mentioned previously can be applied to all certificated staff. Educator preparation programs across the state provide multiple areas of certification, including school counselors, ELL, special education, etc. In particular, special education teachers continue to be identified as a shortage area in our state. The teacher recruitment and retention grants will fund recruitment efforts by LEAs and educator preparation programs to target the recruitment of more individuals to be prepared to be certified as special education teachers, as well as other shortage areas. The teacher retention grants will fund activities that can improve working conditions in schools. Retention grant funds can also be used to expand support staff to allow for increased support for students and for teachers.

> MODESE will work collaboratively with LEAs and with professional partners to clearly establish needs and solutions to support students' social, emotional, and mental health needs. These efforts may include providing a standard tool to gauge those needs. Even absent a standard tool, headlines alone tell us that our students experience trauma and loss, both in and out of school, every day. We must collectively create better conditions and access to supports for them.

G. Monitoring and Measuring Progress

The Department recognizes that transparency on how ARP ESSER funds are used and their impact on the Nation's education system is a fundamental responsibility of Federal, State, and local government. In this section, SEAs will describe how they are building capacity at the SEA and LEA levels to ensure high-quality data collection and reporting and to safeguard funds for their intended purposes.

 <u>Capacity for Data Collection and Reporting</u>: It is important for an SEA to continuously monitor progress and make adjustments to its strategies, as well as to support its LEAs in making adjustments to LEA strategies, based on impact. Describe how the SEA will ensure its capacity and the capacity of its LEAs to collect data on reporting requirements, including but not limited to the examples of reporting requirements described in the SEA's Grant Award Notification (listed in Appendix B). Describe the SEA's capacity and strategy to collect data from its LEAs (disaggregated by student group, where applicable), to the greatest extent practicable, including any steps the SEA will take to build its capacity in the future (which may include the use of ARP ESSER and other Federal COVID-19 pandemic funds at the SEA and LEA levels), on issues that may include the following:

- i. Student learning, including the academic impact of lost instructional time during the COVID-19 pandemic;
- Opportunity to learn measures (e.g., chronic absenteeism; student engagement; use of exclusionary discipline; access to and participation in advanced coursework; access to technology, including educator access to professional development on the effective use of technology; access to high-quality educators; access to school counselors, social workers, nurses, and school psychologists; and results from student, parent, and/or educator surveys);
- iii. Fiscal data that is comparable across the State (e.g., per-pupil expenditures at the LEA and school levels);
- iv. Jobs created and retained (by position type);
- v. Participation in programs funded by ARP ESSER resources (e.g., summer and afterschool programs); and
- vi. Other reporting requirements reasonably required by the Secretary (please refer to Appendix B of this template; final requirements will be issued separately).

Response As noted previously, MODESE has been proactively collecting data to inform decision-making and resource deployment. While MODESE currently collects a significant amount of data on student learning, the opportunity to learn, fiscal condition, jobs created and retained, and program participation, the data are not as usable as they should be. Further, the data are not collected frequently enough. In short, the capacity of the agency to collect, analyze, and disseminate information in a timely fashion is less than is needed to support LEAs and students. MODESE must increase its data system capacity and data usability. MODESE plans to implement Ed-Fi® to ensure interoperability with the 555 LEAs' platforms in use. Ed-Fi® implementation will enable MODESE to collect data much more frequently than the current yearly cycle. Concurrent with Ed-Fi® implementation, MODESE will implement CEDS to ensure that the data being analyzed is as accurate as possible. Finally, MODESE is exploring implementing SCEDS to standardize course codes across the 555 LEAs.

> Overhauling the cumbersome data system is necessary but is not all that is needed. In addition to the improvements named above, MODESE is focused on ensuring that the data it acquires is usable for stakeholders. MODESE will continue to use analytic and visualization tools to improve the accuracy and usability of public reports.

Improved data services will provide the MODESE with the ability to collect, analyze, and report data much more efficiently and effectively than it currently can. The benefits include the ability for MODESE to identify and respond to school and student needs more quickly. Additionally, the agency will be able to share the results of the analyses with the field and the public in ways that better support student learning during and beyond the pandemic.

2. <u>Monitoring and Internal Controls</u>: Describe how the SEA will implement appropriate fiscal monitoring of and internal controls for the ARP ESSER funds (e.g., by updating the SEA's plan for monitoring funds and internal controls under the CARES and CRRSA Acts; addressing potential sources of waste, fraud, and abuse; conducting random audits; or other tools). In this response, please describe the SEA's current capacity to monitor ARP ESSER; steps, if needed, to increase capacity; and any foreseeable gaps in capacity, including how the SEA will provide its LEAs with technical assistance in the anticipated areas of greatest need.

Response MODESE has an established fiscal monitoring procedure referred to as the TM System for all federal funds and it will be utilized for the ARP ESSER funds as well. Through the TM System, every subrecipient will go through the desk application review process. The desk application review process consists of the review and approval of budget applications, payment requests, Final Expenditure Reports (FERs), plans, and any other supporting documentation/data. It also includes technical assistance provided over the phone, in manuals, by email, and through trainings. After the desk application review process and if the subrecipient's application is accepted, then subrecipients are subject to desk or onsite monitoring. The type of monitoring assigned is based on an annual risk assessment.

The fiscal liaison, Program Director, and/or the Program Director designee will complete the fiscal monitoring process. Monitoring generally occurs after the subrecipients submit the FER for the program.

A risk assessment for all subrecipients is performed on an annual basis to determine the level of risk. Risk factors may include

- Audit Findings;
- New Personnel;
- Fiscal Monitoring Findings from Prior Years;
- Late Budget;
- Late FER;
- Allocation Amount;
- Overpayments;
- Lapsed/Forfeited Funds;

- Financial Concerns (may include Financial Distress, Impending School Closure, Indications of Fraud/Abuse, High Risk Financial Plan Assignment, or Award Restrictions);
- Timely Correction of Findings; and
- Other Program Specific Criteria.

Based upon the results of the risk assessment, all subrecipients are categorized as high, moderate, or low risk. Each risk category is assigned to a specific level of monitoring.

Subrecipients identified as high risk are subject to onsite monitoring, and/or one or more of the following:

- Virtual Visit Monitoring;
- Desk Monitoring;
- Phone Monitoring;
 - o Submission of Additional Documentation; and/or
 - Required Attendance at Trainings/Technical Assistance.

The onsite monitoring process consists of a documentation review prior to and/or during the onsite visit based on a set of pre-determined questions. Upon completion of the onsite review, MODESE issues a report with any required corrective actions. The subrecipient must complete corrective actions within 30 days of receipt of the report. The onsite monitoring process is completed through the TM system.

Subrecipients identified as moderate risk may be subject to desk monitoring and/or one or more of the following:

- Virtual Visit Monitoring;
- Phone Monitoring;
- Submission of Additional Documentation Required Attendance at Trainings/Technical Assistance; and/or
- No Action.

The desk monitoring process consists of the completion and submission of a selfassessment by the subrecipient. MODESE reviews the responses and if any concerns arise during the review, subrecipients may be required to submit documentation (general ledgers, invoices, policies, procedures, inventories, etc.) for further review. The subrecipient must complete corrective actions within 30 days of receipt of the report. The desk monitoring process is completed through the TM System.

Subrecipients identified as low risk may be subject to one or more of the following:

- Trainings/Technical Assistance;
- Submission of Additional Documentation; and/or

• No Action.

MODESE has an established internal control plan that addresses procedures for grant drawdowns, cash receipts, procurement, payroll, refunds, investments, segregation of duties, credit cards, time records, authorized personnel, internal monitoring, and audit review. All funds and programs within MODESE follow the procedures outlined in the internal control plan. CARES, CRRSA, and ARP ESSER will follow these procedures as well.

MODESE has a strong system of providing technical assistance in place. Additionally, staff members have begun collaborative training across the financial and programmatic aspects of ARP ESSER. As LEAs require technical assistance, staff members will respond to those needs. MODESE will also provide technical assistance through webinars, manuals, guidance documents, and timelines. MODESE will provide sample procedures, forms, and documents to assist subrecipients. Because ESSER and CRRSA ESSER have been implemented with success, fiscal monitoring routines have been established. MODESE anticipates the need for some additional capacity to administer ARP ESSER due to the differences between ARP ESSER and the previous iterations.

In addition, MODESE has added two full-time staff to track and monitor relief funds. However, MODESE does not have the capacity without legislative approval, to hire more full-time staff. Therefore, MODESE has retained hourly staff to address monitoring and the desk application review process for relief funds. As previously mentioned, the desk application review process consists of the review and approval of budget applications, payment requests, FERs, plans, and supporting documentation/data. The process also includes technical assistance provided over the phone, in manuals, by email, and through trainings. Hourly staff have either previously worked within MODESE and have knowledge of federal grants and funds, or have been thoroughly trained on these programs by experienced full-time staff. MODESE has cross-trained and structured work through a team-based approach to minimize disruptions to the work flow. To the extent that future conditions require, MODESE will either hire additional hourly staff or contract for professional services.

Appendix A: School Operating Status and Instructional Mode Data Template

Indicate the date or time period represented by the following data.

The data in Table 1 reflects the time period of October 15, 2020 through February 15, 2021 and represents data aggregated at the LEA level. The data in Table 2 reflects the time period of October 15, 2020 through February 15, 2021. This is the most recent data available at the student level. The data includes LEAs and schools operated by the Missouri Division of Youth Services, which is part of the Missouri Department of Social Services.

Table 1

In the most recent time period available, how many schools in your State offered each mode of instruction or learning model described below? Each row should account for all schools in your State, so that, for each row, the sum of the numbers in the "offered to all students," "offered to some students," and "not offered" columns is equal to the number in the "all schools" column.

It is important to understand that Missouri statute requires that every school Response district and charter school provide eligible students the option to enroll in MOCAP, the state's virtual instruction program. Because this application uses the term "offer" in regard to each mode of instruction, the grid could easily be simplified to say that all 2,312 Missouri schools offer remote or online instruction to all students. The resulting grid would be accurate but meaningless. MODESE did not collect modes of instruction at the building level. Consequently, MODESE chose to complete this grid by aggregating student level data, which does provide the mode of instruction for each student. Therefore, the numbers in Table 1 reflect what actually happened – whether the mode was school determined or an option exercised by students and families – in each building. MODESE has amended the row and column headings to more accurately reflect the data presented. Again, the vast majority of Missouri LEAs have been offering onsite options throughout the 2020-21 school year, never falling below 75 percent.

Further complicating the response to this question is the fact that Missouri provided an emergency regulation, noted throughout this application, to preserve as much onsite instruction as possible while creating social distancing. LEAs implemented hybrid instruction differently as local conditions drove decision making.

Number of Schools	All schools	Mode(s) for students	Offered to some students	Remaining Schools
All students were distanced	2,312	25	0	2,287
School buildings open where one or more combinations of onsite and distanced instruction was present	2,312	1689	0	623
School buildings open with full-time in-person instruction	2,312	598	0	1,714
Number of Elementary Schools	All elementary schools	Mode(s) for students	Offered to some students	Remaining Schools
All students were distanced	1,384	13	0	1,371
School buildings open where one or more combinations of onsite and distanced instruction was present	1,384	1,005	0	379
School buildings open with full-time in-person instruction	1,384	366	0	1,018
Number of Middle Schools	All middle schools	Mode(s) for students	Offered to some students	Remaining Schools
All students were distanced	362	6	0	356
School buildings open where one or more combinations of onsite and distanced instruction was present	362	297	0	65
School buildings open with full-time in-person instruction	362	59	0	303
Number of High Schools	All high schools	Mode(s) for students	Offered to some students	Remaining Schools
All students were distanced	566	6	0	560
School buildings open where one or more combinations of onsite and distanced instruction was present	566	387	0	179
School buildings open with full-time in-person instruction	566	173	0	393

To the extent data are available, please complete the above table for 1) all schools in the State, and 2) separately for each instructional level (e.g., pre-kindergarten/elementary schools, middle schools, high schools).

Table 2

In the most recent time period available, what was the enrollment and mode of instruction for the schools in your State?

Number of students	Total enrollment	Remote or online only	Both remote/online and in-person instruction (hybrid)	Full-time in- person instruction
All Students	886,355	130,630	209,767	545,958
Students from low-income families	407,644	64,892	98,933	243,819
White, not Hispanic	546,177	62,673	115,527	367,977
Black or African American, not				
Hispanic	130,035	30,181	56,058	43,796
Hispanic, of any race	60,377	10,881	15,945	33,551
Asian, not Hispanic	15,679	5,733	4,197	5,749
American Indian or Alaskan Native, not Hispanic	3,031	440	573	2,018
Native Hawaiian or Pacific Islander, not Hispanic	3,111	441	887	1,783
Two or more races, not Hispanic	40,744	7,670	9,446	23,628
Race/Ethnicity information not available	87,201	12,611	7,134	67,456
English learners	45,654	10,768	12,969	21,917
Children with disabilities	123,671	16,081	27,782	79,808
Students experiencing homelessness	22,883	4,498	6,280	12,105
Children and youth in foster care	5,414	528	1,106	3,780
Migratory students	401	25	62	314
Female	387,056	59,898	98,065	229,093
Male	412,123	58,122	104,570	249,431
Gender N/A	87,176	12,610	7,132	67,434

Appendix B: Reporting Language Included in the Grant Award Notification ("GAN")

As described in the Grant Award Notification ("GAN"), the SEA will comply with, and ensure that its LEAs comply with, all reporting requirements at such time and in such manner and containing such information as the Secretary may reasonably require, including on matters such as:

- How the State is developing strategies and implementing public health protocols including, to the greatest extent practicable, policies and plans in line with the CDC guidance related to mitigating COVID-19 in schools;
- Overall plans and policies related to State support for return to in-person instruction and maximizing in-person instruction time, including how funds will support a return to and maximize in-person instruction time, and advance equity and inclusivity in participation in in-person instruction;
- Data on each school's mode of instruction (fully in-person, hybrid, and fully remote) and conditions;
- SEA and LEA uses of funds to meet students' social, emotional, and academic needs, including through summer enrichment programming and other evidence-based interventions, and how they advance equity for underserved students;
- SEA and LEA uses of funds to sustain and support access to early childhood education programs;
- Impacts and outcomes (disaggregated by student subgroup) through use of ARP ESSER funding (e.g., quantitative and qualitative results of ARP ESSER funding, including on personnel, student learning, and budgeting at the school and district level);
- Student data (disaggregated by student subgroup) related to how the COVID-19 pandemic has affected instruction and learning;
- Requirements under the Federal Financial Accountability Transparency Act ("FFATA"); and
- Additional reporting requirements as may be necessary to ensure accountability and transparency of ARP ESSER funds.

Appendix C: Assurances

By signing this document, the SEA assures all of the following:

- The SEA will conduct all its operations so that no person shall be excluded from participation in, be denied the benefits of, or be subject to discrimination under the ARP ESSER program or activity based on race, color, national origin, which includes a person's limited English proficiency or English learner status and a person's actual or perceived shared ancestry or ethnic characteristics; sex; age; or disability. These non-discrimination obligations arise under Federal civil rights laws, including but not limited to Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments Act of 1972, section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975. In addition, the SEA must comply with all regulations, guidelines, and standards issued by the Department under any of these statutes;
- The SEA will comply with all ARP Act and other ARP ESSER requirements and all requirements of its Grant Award Notification, including but not limited to:
 - Complying with the maintenance of effort provision in section 2004(a)(1) of the ARP Act, absent a waiver by the Secretary pursuant to section 2004(a)(2) of the ARP Act; and
 - Complying with the maintenance of equity provisions in section 2004(b) of the ARP Act, and ensuring its LEAs comply with the maintenance of equity provision in section 2004(c) of the ARP Act (please note that the Department will provide additional guidance on maintenance of equity shortly);
- The SEA will allocate ARP ESSER funds to LEAs in an expedited and timely manner and, to the extent practicable, not later than 60 days after the SEA receives ARP ESSER funds (i.e., 60 days from the date the SEA receives each portion of its ARP ESSER funds). An SEA that is not able to allocate such funds within 60 days because it is not practicable (e.g., because of pre-existing State board approval requirements) will provide an explanation to the Department within 30 days of receiving each portion of its ARP ESSER funds (submitted via email to your Program Officer at [State].OESE@ed.gov (e.g., Alabama.OESE@ed.gov)), including a description of specific actions the SEA is taking to provide ARP ESSER funds to LEAs in an expedited and timely manner and the SEA's expected timeline for doing so;
- The SEA will implement evidence-based interventions as required under section 2001(f) of the ARP Act and ensure its LEAs implement evidence-based interventions, as required by section 2001(e)(1) of the ARP Act;
- The SEA will address the disproportionate impact of the COVID-19 pandemic on underserved students (i.e., students from low-income families, students from racial or ethnic groups (e.g., identifying disparities and focusing on underserved student groups by race or ethnicity), gender (e.g., identifying disparities and focusing on underserved student groups by gender), English learners, children with disabilities, students experiencing homelessness, children and youth in foster care, and migratory students), as required under section 2001(f) of the ARP Act, and ensure its LEAs address the disproportionate impact of the COVID-19 pandemic on underserved students (i.e., students from low-income families, students from racial or ethnic groups, gender, English learners, children with disabilities, students (i.e., students from low-income families, students experiencing homelessness, children and youth from racial or ethnic groups, gender, English learners, children with disabilities, students from racial or ethnic groups, gender, English learners, children with disabilities, students experiencing homelessness, children and

youth in foster care, and migratory students), as required by section 2001(e)(1) of the ARP Act; and

• The SEA will provide to the Department: (1) the URL(s) where the public can readily find data on school operating status and (2) the URL(s) for the SEA and/or LEA websites where the public can find the LEA plans for a) the safe return to in-person instruction and continuity of services required under section 2001(i) of the ARP Act, and b) use of ARP ESSER funds. SEAs should consider ensuring a standardized URL format in all cases (e.g., xxx.gov/COVIDplan).

Appendix D

OMB Control No. 1894-0005 (Exp. 06/30/2023)

NOTICE TO ALL APPLICANTS

The purpose of this enclosure is to inform you about a new provision in the Department of Educations General Education Provisions Act ("GEPA") that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

To Whom Does This Provision Apply?

Section 427 of GEPA affects applicants for new grant awards under this program. ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.

(If this program is a State-formula grant program, a State needs to provide this description only for projects or activities that it carries out with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding need to provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 statement as described below.)

What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs. This provision allows applicants discretion in developing the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access to, or participation in, the Federally-funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative, or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes, but rather to ensure that, in designing their projects, applicants for Federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and to achieve high standards. Consistent with program requirements and its approved application, an applicant may use the Federal funds awarded to it to eliminate barriers it identifies.

What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?

The following examples may help illustrate how an applicant may comply with Section 427.

(1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.

(2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.

(3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.

(4) An applicant that proposes a project to increase school safety might describe the special efforts it will take to address concerns of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students.

We recognize that many applicants may already be implementing effective steps to ensure equity of access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

In carrying out its educational mission, the Missouri Department of Elementary Response and Secondary Education (MODESE) provides reasonable and appropriate accommodations to ensure equal access to and participation in its programs for students, school and district staff, agency employees, and others. Federally funded activities, programs and services are accessible, and this grant will also be accessible, to all teachers, students, and other program beneficiaries with special needs allowing them to participate fully in the projects. It is the policy of MODESE not to discriminate on the basis of race, color, religion, gender, gender identity, sexual orientation, national origin, age, veteran status, mental or physical disability, or any other basis prohibited by statute in its programs or employment practices as required by Title VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title II of the Americans with Disabilities Act of 1990, and the Americans with Disabilities Act Amendments Act of 2008 (ADAAA), the Genetic Information Non-Discrimination Act (GINA), or USDA Title VI.

Estimated Burden Statement for GEPA Requirements

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 3 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Public Law 103-382). Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland Ave., SW, Washington, DC 20210-4537 or email ICDocketMgr@ed.gov and reference the OMB Control Number 1894-0005.